

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**IN THE MATTER OF THE  
APPLICATION OF THE REPORTERS  
COMMITTEE FOR FREEDOM OF THE  
PRESS TO UNSEAL CERTAIN SEARCH  
WARRANT APPLICATIONS AND  
RELATED JUDICIAL DOCUMENTS**

**Misc. Action No. 1:18-MC-320-KPF**

**NOTICE OF PETITIONER’S MOTION FOR LEAVE TO AMEND ITS APPLICATION  
TO UNSEAL CERTAIN SEARCH WARRANT APPLICATIONS AND RELATED  
JUDICIAL DOCUMENTS UNDER RULE 15**

The Reporters Committee for Freedom of the Press (“Reporters Committee” or “Petitioner”) hereby gives notice that it will respectfully move this Court before the Honorable Katherine Polk Failla in the U.S. District Court for the Southern District of New York on December 21, 2018, at a time and place to be set by the Court, for an order granting Petitioner leave to amend its Application to Unseal Certain Search Warrant Applications and Related Judicial Documents (the “Application”) in the above-captioned matter.

As set forth in the supporting memorandum of law and declaration of Katie Townsend, Petitioner’s motion for leave to amend the Application should be granted, because the amendment will not prejudice any party involved in this action, and because it is made in good faith, following meet and confer discussions between the parties, for the purpose of clarifying the issues that may ultimately be presented to the Court. The Reporters Committee has conferred with the U.S. Attorney’s Office for the Southern District of New York regarding this motion. The U.S. Attorney’s Office has indicated that it takes no position on Petitioner’s motion to amend.

December 21, 2018

Respectfully submitted,

/s/ Katie Townsend

Katie Townsend

THE REPORTERS COMMITTEE FOR

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